## IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE AT KNOXVILLE

UNITED STATES OF AMERICA	)	
	)	
vs.	)	3:23-CR-000068
	)	(VARLAN/POPLIN)
MELODY SASSER	)	

## MOTION TO CONTINUE TRIAL AND ALL ASSOCIATED DEADLINES

Comes the Defendant, Melody Sasser, by and through the undersigned counsel, and respectfully moves this Court to enter an Order continuing all Motion deadlines and the current trial date of August 15, 2023. In support of this Motion, counsel would show the following:

- Counsel further avers that this case is complex and counsel needs additional time
  to review all discovery, negotiate a plea agreement, and/or prepare this case for
  trial.
- 2. This motion has been discussed with Ms. Sasser, who understands that a continuance of the trial date will necessarily affect the computation of time pursuant to the Speedy Trial Act, 18 U.S.C. § 3161.
- 3. The Defendant respectfully submits that the ends of justice served by granting a continuance outweigh the best interest of the public and the Defendant in a speedy trial, pursuant to 18 U.S.C. § 3161(h)(7)(A). The failure to grant a continuance would likely cause a miscarriage of justice (18 U.S.C. § 3161(h)(7)(B)(i)), or would deny counsel for the Defendant reasonable time for effective preparation,

taking into consideration the exercise of due diligence (18 U.S.C. § 3161(h)(7)(B)(iv).

4. Counsel avers that he has spoken with AUSA Anne-Marie Svolto and she is not opposed to a continuance in this matter.

Wherefore, counsel requests a continuance of all Motion deadlines and the current trial date of August 15, 2023.

Respectfully submitted this 19<sup>th</sup> day of July, 2023.

/s/ M. Jeffrey Whitt

M. JEFFREY WHITT Counsel for Defendant 607 Market Street, Suite1100 Knoxville, Tennessee 37902 (865) 524-8106

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and exact copy of the foregoing document was filed electronically on July 19, 2023. Notice of this filing will be sent by the Court's electronic filing system and will be served on all parties indicated on the receipt. All other parties will be served via U.S. Mail.

/s/ M. Jeffrey Whitt

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